

SCARING & CARMAN PLLC

ATTORNEYS AT LAW

SUITE 501

666 OLD COUNTRY ROAD

GARDEN CITY, N.Y. 11530-2004

(516) 683-8500

FAX

(516) 683-8410

STEPHEN P. SCARING, P.C.
SUSAN SCARING CARMAN

MATTHEW W. BRISSENDEN
OF COUNSEL

sscaring@scaringlaw.com
scarmen@scaringlaw.com

July 28, 2020

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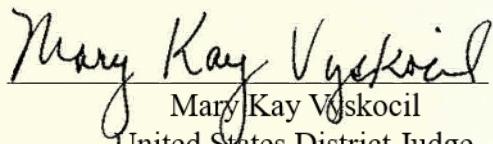
BY ECF

Hon. Mary Kay Vyskocil
United States District Court Judge
for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Navarro, et al.
20-CR-00160

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cmqy "tcxgn'q"P gy "Ecpccp."Eqppge\ew'qp"j g'fc{ u"cpf "
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Date: 7/29/2020
New York, New York


Mary Kay Vyskocil
United States District Judge

Dear Judge Vyskocil:

Please accept this letter as a renewal of the travel request we submitted on behalf of Dr. Kristian Rhein. To begin, I apologize for not including the Government's position on the application at the time that it was filed.

I have spoken with AUSA Andrew Adams, and he has advised me that he consents to the application for bail modification as set forth in my letter dated July 27, 2020. He authorized me to advise the Court of his position. In addition, while untimely, we did provide the Court with Pre-Trial's position regarding this application, and they do not object.

I would appreciate it if the Court would reconsider its position denying the application. Lacrosse is an important aspect of Dr. and Mrs. Rhein's family activities. These tournaments offer high school students an opportunity to showcase their skills to college recruiters.

The children look forward to their family's support, especially during these difficult times.

Thank you in advance for your reconsideration of this important application.

Respectfully submitted,

Stephen P. Scaring

STEPHEN P. SCARING

cc: AUSA Andrew Adams (ECF)
SPS/cn